

# Statement of Basis of the Federal Operating Permit

Eco Services Operations Corp.

Site Name: Houston Plant  
Area Name: Houston Plant  
Physical Location: 8615 Manchester St  
Nearest City: Houston  
County: Harris

Permit Number: O3049  
Project Type: Renewal

The North American Industry Classification System (NAICS) Code: 325188  
NAICS Name: All Other Basic Inorganic Chemical Manufacturing

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: June 21, 2019

## Operating Permit Basis of Determination

### Permit Area Process Description

There are two overall processes used at the site for creating sulfuric acid, H<sub>2</sub>SO<sub>4</sub>. PRO-UNIT8 creates sulfuric acid by combining the base components, and PRO-REGEN regenerates acid that has already been reacted, or spent acid.

In the PRO-UNIT8 process, sulfuric acid is created by means of a three step reaction process.

In the first step, the combustion furnace is used to create molten sulfur which is then atomized and burned in the presence of dry air to produce sulfur dioxide, SO<sub>2</sub>. Some trace amounts of sulfur trioxide, SO<sub>3</sub>, are also produced. The air must be dry to prevent the moisture from reacting with the SO<sub>3</sub>, prematurely creating sulfuric acid, which would quickly corrode the equipment downstream of the furnace.

The combustion gases pass through a boiler for heat recovery, and then through a vanadium substrate catalytic converter. The combustion gases pass over the multiple beds of the converter where the second reaction occurs. SO<sub>2</sub> is combined with dry oxygen to create SO<sub>3</sub>, and the vanadium catalyst helps increase the yield of the reaction.

Lastly, sulfur trioxide is allowed to contact an already created stream of sulfuric acid in an absorbing tower. Absorption of the sulfur trioxide increases the strength of the acid. Addition water, H<sub>2</sub>O, is then added to bring the acidity back to its desired strength. The gas that exits the absorbing tower is passed through a mist filter to remove acid mist and the tail gas is exhausted through the stack.

In the PRO-REGEN process hazardous wastes and spent acid are combusted in a furnace whereby entrained hydrocarbons are burned off and the acid is decomposed. The combustion gases are passed through a scrubbing tower, a direct contact gas cooler, and two electrostatic precipitators, ESPs. Moisture is removed by running the gas through a packed tower, and then through a converter and an absorbing tower, similar to the previous process as described above. VOC emissions from all process sources are routed to the backup flare.

### FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

### Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	SO <sub>2</sub> , NOX
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### Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - Compliance Requirements
  - Protection of Stratosphere Ozone
  - Permit Location
  - Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - Compliance Plan
  - Alternative Requirements
- Appendix A
  - Acronym list
- Appendix B
  - Copies of major NSR authorizations

#### General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

#### Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

#### Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable

requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

**Additional Monitoring Requirement.** The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

**Permit Shield.** A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

**New Source Review Authorization References.** All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

**Compliance Plan.** A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

**Alternative Requirements.** This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

## Appendix A

**Acronym list.** This attachment lists the common acronyms used when discussing the FOPs.

## Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

### **Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions**

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

### **Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions**

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

<b>Regulatory Program</b>	<b>Applicability (Yes/No)</b>
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes

Regulatory Program	Applicability (Yes/No)
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO <sub>2</sub> Trading Program)	No

### Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

### Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.

9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

### **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at [www.tceq.texas.gov/permitting/air/nav/air\\_all\\_ua\\_forms.html](http://www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html).

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at [www.tceq.texas.gov/permitting/air/nav/air\\_supportsys.html](http://www.tceq.texas.gov/permitting/air/nav/air_supportsys.html). The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations

that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

#### Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.



### Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
DWP1	30 TAC Chapter 117, Subchapter B	R7ICI-0003	Type of Service = New, modified, reconstructed or relocated diesel fuel-fired engine, placed into service on or after October 1, 2001, located in the Houston/Galveston/Brazoria ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average	
DWP1	40 CFR Part 60, Subpart IIII	60IIII-0001	<p>Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005.</p> <p>Diesel = Diesel fuel is used.</p> <p>Kilowatts = Power rating is greater than or equal to 37 KW and less than 75 KW.</p> <p>Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.</p> <p>Displacement = Displacement is less than 10 liters per cylinder.</p> <p>Service = CI ICE is an emergency engine.</p> <p>Standards = The emergency CI ICE meets the standards applicable to non-emergency engines.</p> <p>Commencing = CI ICE was newly constructed after 07/11/2005.</p> <p>Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions.</p> <p>Manufacture Date = Date of manufacture was after 04/01/2006.</p> <p>Model Year = CI ICE was manufactured in model year 2007.</p>	
DWP1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP less than 100 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.</p>	
DWP2	30 TAC Chapter 117, Subchapter B	R7ICI-0004	<p>Type of Service = Used exclusively in emergency situations [claiming the emergency service exemption under 30 TAC §§ 117.103(a)(6)(D), 117.203(a)(6)(D), 117.303(a)(6)(D) or 117.403(a)(7)(D)]</p> <p>Fuel Fired = Petroleum-based diesel fuel</p>	
DWP2	40 CFR Part 60, Subpart IIII	60IIII-0002	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before 07/11/2005.	
DWP2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0002	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = Compression ignition engine</p>	
48	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>	
48	40 CFR Part 60, Subpart Kb	60Kb-0002B	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = CVS and control device other than a flare (fixed roof)</p>	
49	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>	
49	40 CFR Part 60, Subpart K	60K-0003	Construction/Modification Date = On or before June 11, 1973	
49	40 CFR Part 60, Subpart Kb	60Kb-0002B	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Storage Vessel Description = CVS and control device other than a flare (fixed roof)	
53	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>	
53	40 CFR Part 60, Subpart Kb	60Kb-0002	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = CVS and control device other than a flare (fixed roof)</p>	
56	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>	
56	40 CFR Part 60, Subpart K	60K-0003	Construction/Modification Date = On or before June 11, 1973	
78	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>	
78	40 CFR Part 60, Subpart K	60K-0003	Construction/Modification Date = On or before June 11, 1973	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
B1	30 TAC Chapter 115, Storage of VOCs	R5112-0001	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>	
B1	40 CFR Part 60, Subpart Kb	60Kb-0002	<p>Product Stored = Waste mixture of indeterminate or variable composition</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = CVS and control device other than a flare (fixed roof)</p>	
B1	40 CFR Part 61, Subpart FF	61FF-0002	<p>Bypass Line = The closed vent system does not contain any by-pass line that could divert the vent stream away from the control device.</p> <p>Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device.</p> <p>Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.</p> <p>Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351.</p> <p>Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system.</p> <p>Control Device Type/Operations = Thermal vapor incinerator that provides a minimum residence time of 0.5 seconds at a minimum temperature of 760° C</p> <p>Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR § 61.343(a)(1)(i)(C)(1) - (3).</p> <p>Closed Vent System and Control Device AMOC = Not using an alternate means of compliance</p> <p>Alternate Monitoring Parameters = Alternate monitoring parameters not requested</p> <p>Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.</p>	
B2	30 TAC Chapter 115, Storage of VOCs	R5112-0001	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>Product Stored = VOC other than crude oil or condensate</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>	
B2	40 CFR Part 60, Subpart Kb	60Kb-0002	<p>Product Stored = Waste mixture of indeterminate or variable composition</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = CVS and control device other than a flare (fixed roof)</p>	
B2	40 CFR Part 61, Subpart FF	61FF-0002	<p>Bypass Line = The closed vent system does not contain any by-pass line that could divert the vent stream away from the control device.</p> <p>Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device.</p> <p>Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.</p> <p>Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351.</p> <p>Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system.</p> <p>Control Device Type/Operations = Thermal vapor incinerator that provides a minimum residence time of 0.5 seconds at a minimum temperature of 760° C</p> <p>Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR § 61.343(a)(1)(i)(C)(1) - (3).</p> <p>Closed Vent System and Control Device AMOC = Not using an alternate means of compliance</p> <p>Alternate Monitoring Parameters = Alternate monitoring parameters not requested</p> <p>Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.</p>	
DIESEL	30 TAC Chapter 115, Storage of VOCs	R5112-0003	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>	
DIESEL	40 CFR Part 60, Subpart Kb	60Kb-0003	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
DIESEL TK	30 TAC Chapter 115, Storage of VOCs	R5112-0005	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	
F2	30 TAC Chapter 115, Storage of VOCs	R5112-0004	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>	
F2	40 CFR Part 60, Subpart K	60K-0001	<p>Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978</p> <p>Storage Capacity = Capacity is greater than 65,000 gallons (246,052 liters)</p> <p>Product Stored = Stored product other than petroleum liquid (as defined in 40 CFR Part 60, Subpart K)</p>	
F2	40 CFR Part 61, Subpart FF	61FF-0002	<p>Bypass Line = The closed vent system does not contain any by-pass line that could divert the vent stream away from the control device.</p> <p>Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device.</p> <p>Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.</p> <p>Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351.</p> <p>Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system.</p> <p>Control Device Type/Operations = Thermal vapor incinerator that provides a minimum residence time of 0.5 seconds at a minimum temperature of 760° C</p> <p>Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR § 61.343(a)(1)(i)(C)(1) - (3).</p> <p>Closed Vent System and Control Device AMOC = Not using an alternate means of compliance</p> <p>Alternate Monitoring Parameters = Alternate monitoring parameters not requested</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.	
F2	40 CFR Part 63, Subpart G	63GT-WW12	<p>Negative Pressure = The fixed roof and closed vent systems are not operated and maintained under negative pressure.</p> <p>Process Wastewater = The tank receives, manages, or treats process wastewater streams</p> <p>Wastewater Tank Usage = The wastewater tank is not used for heating wastewater, treating by means of an exothermic reaction, nor are the contents of the tank are sparged.</p> <p>Closed Vent System = Closed vent system is not maintained under negative pressure and is subject to 40 CFR § 63.148</p> <p>Wastewater Tank Properties = Properties do not qualify for exemption</p> <p>By-pass Lines = Closed vent system has no by-pass lines</p> <p>Emission Control Type = Fixed roof tank vented through a closed vent system that routes the organic HAP vapors vented from the wastewater tank to a control device</p> <p>Combination of Control Devices = The vent stream is treated using a single control device.</p> <p>Control Device Type = Boiler or process heater burning hazardous waste</p> <p>New Source = The source is an existing source.</p> <p>Alternate Monitoring Parameters = Alternate monitoring parameters for the control device have not been requested or approved.</p>	
F2	40 CFR Part 63, Subpart G	63GT-WW4	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Negative Pressure = The fixed roof and closed vent systems are not operated and maintained under negative pressure.</p> <p>Process Wastewater = The tank receives, manages, or treats process wastewater streams</p> <p>Wastewater Tank Usage = The wastewater tank is not used for heating wastewater, treating by means of an exothermic reaction, nor are the contents of the tank are sparged.</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Performance Test = Performance tests are not conducted using the methods and procedures specified in § 63.145(i).</p> <p>Wastewater Tank Properties = Properties do not qualify for exemption</p> <p>By-pass Lines = Closed vent system has no by-pass lines</p> <p>Emission Control Type = Fixed roof tank vented through a closed vent system that routes the organic HAP vapors vented from the wastewater tank to a control device</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has no by-pass lines.</p> <p>Combination of Control Devices = The vent stream is treated using a single control device.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Monitoring Options = Control device is using the monitoring parameters specified in Table 13 of Subpart G.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of § 63.143(e)(1) or § 63.143(e)(2) in Table 13.</p> <p>Control Device Type = Thermal incinerator</p> <p>Control Device Type = Thermal vapor incinerator</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>New Source = The source is an existing source.</p> <p>Compliance with 40 CFR 63.139(c)(1) = The enclosed combustion device being used meets the 0.5 second residence time at 760° C provisions specified in 40 CFR § 63.139(c)(1)(iii)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Alternate Monitoring Parameters = Alternate monitoring parameters for the control device have not been requested or approved.</p> <p>Design Evaluation Submitted = Results of a performance test was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>	
F3	30 TAC Chapter 115, Storage of VOCs	R5112-0001	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>	
F3	40 CFR Part 60, Subpart K	60K-0002	<p>Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons (151,416 liters) and less than or equal to 65,000 gallons (246,052 liters)</p> <p>Product Stored = Stored product other than petroleum liquid (as defined in 40 CFR Part 60, Subpart K)</p>	



Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
F3	40 CFR Part 61, Subpart FF	61FF-0002	<p>Bypass Line = The closed vent system does not contain any by-pass line that could divert the vent stream away from the control device.</p> <p>Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device.</p> <p>Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.</p> <p>Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351.</p> <p>Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system.</p> <p>Control Device Type/Operations = Thermal vapor incinerator that provides a minimum residence time of 0.5 seconds at a minimum temperature of 760° C</p> <p>Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR § 61.343(a)(1)(i)(C)(1) - (3).</p> <p>Closed Vent System and Control Device AMOC = Not using an alternate means of compliance</p> <p>Alternate Monitoring Parameters = Alternate monitoring parameters not requested</p> <p>Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.</p>	
F3	40 CFR Part 63, Subpart G	63GT-WW12	<p>Negative Pressure = The fixed roof and closed vent systems are not operated and maintained under negative pressure.</p> <p>Process Wastewater = The tank receives, manages, or treats process wastewater streams</p> <p>Wastewater Tank Usage = The wastewater tank is not used for heating wastewater, treating by means of an exothermic reaction, nor are the contents of the tank are sparged.</p> <p>Closed Vent System = Closed vent system is not maintained under negative pressure and is subject to 40 CFR § 63.148</p> <p>Wastewater Tank Properties = Properties do not qualify for exemption</p> <p>By-pass Lines = Closed vent system has no by-pass lines</p> <p>Emission Control Type = Fixed roof tank vented through a closed vent system that routes the organic HAP vapors vented from the wastewater tank to a control device</p> <p>Combination of Control Devices = The vent stream is treated using a single control device.</p> <p>Control Device Type = Boiler or process heater burning hazardous waste</p> <p>New Source = The source is an existing source.</p> <p>Alternate Monitoring Parameters = Alternate monitoring parameters for the control device have not been requested or approved.</p>	
F3	40 CFR Part 63, Subpart G	63GT-WW4	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Negative Pressure = The fixed roof and closed vent systems are not operated and maintained under negative pressure.</p> <p>Process Wastewater = The tank receives, manages, or treats process wastewater streams</p> <p>Wastewater Tank Usage = The wastewater tank is not used for heating wastewater, treating by means of an exothermic reaction, nor are the contents of the tank are sparged.</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Performance Test = Performance tests are not conducted using the methods and procedures specified in § 63.145(i).</p> <p>Wastewater Tank Properties = Properties do not qualify for exemption</p> <p>By-pass Lines = Closed vent system has no by-pass lines</p> <p>Emission Control Type = Fixed roof tank vented through a closed vent system that routes the organic HAP vapors vented from the wastewater tank to a control device</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has no by-pass lines.</p> <p>Combination of Control Devices = The vent stream is treated using a single control device.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Monitoring Options = Control device is using the monitoring parameters specified in Table 13 of Subpart G.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of § 63.143(e)(1) or § 63.143(e)(2) in Table 13.</p> <p>Control Device Type = Thermal incinerator</p> <p>Control Device Type = Thermal vapor incinerator</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>New Source = The source is an existing source.</p> <p>Compliance with 40 CFR 63.139(c)(1) = The enclosed combustion device being used meets the 0.5 second residence time at 760° C provisions specified in 40 CFR § 63.139(c)(1)(iii)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Alternate Monitoring Parameters = Alternate monitoring parameters for the control device have not been requested or approved.</p> <p>Design Evaluation Submitted = Results of a performance test was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
H1	30 TAC Chapter 115, Storage of VOCs	R5112-0002	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>	
H1	40 CFR Part 60, Subpart Kb	60Kb-0001	<p>Product Stored = Waste mixture of indeterminate or variable composition</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>	
H1	40 CFR Part 61, Subpart FF	61FF-0002	<p>Bypass Line = The closed vent system does not contain any by-pass line that could divert the vent stream away from the control device.</p> <p>Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device.</p> <p>Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.</p> <p>Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351.</p> <p>Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system.</p> <p>Control Device Type/Operations = Thermal vapor incinerator that provides a minimum residence time of 0.5 seconds at a minimum temperature of 760° C</p> <p>Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR § 61.343(a)(1)(i)(C)(1) - (3).</p> <p>Closed Vent System and Control Device AMOC = Not using an alternate means of compliance</p> <p>Alternate Monitoring Parameters = Alternate monitoring parameters not requested</p> <p>Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.</p>	
H1	40 CFR Part 63, Subpart GGG	63GGG-2	<p>Wastewater Tank = The wastewater tank that receives, manages, or treats affected wastewater or a residual removed from affected wastewater and is subject to 40 CFR Part 63, Subpart GGG.</p>	The rule citations were determined from an analysis of the rule text and the basis of determination.
H2	30 TAC Chapter 115, Storage of VOCs	R5112-0002	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>Product Stored = VOC other than crude oil or condensate</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>	
H2	40 CFR Part 60, Subpart Kb	60KB-0001	<p>Product Stored = Waste mixture of indeterminate or variable composition</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>	
H2	40 CFR Part 61, Subpart FF	61FF-0002	<p>Bypass Line = The closed vent system does not contain any by-pass line that could divert the vent stream away from the control device.</p> <p>Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device.</p> <p>Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.</p> <p>Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351.</p> <p>Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system.</p> <p>Control Device Type/Operations = Thermal vapor incinerator that provides a minimum residence time of 0.5 seconds at a minimum temperature of 760° C</p> <p>Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR § 61.343(a)(1)(i)(C)(1) - (3).</p> <p>Closed Vent System and Control Device AMOC = Not using an alternate means of compliance</p> <p>Engineering Calculations = Engineering calculations show that the control device is proven to achieve its emission limitation.</p> <p>Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.</p>	
H2	40 CFR Part 63, Subpart GGG	63GGG-2	<p>Wastewater Tank = The wastewater tank that receives, manages, or treats affected wastewater or a residual removed from affected wastewater and is subject to 40 CFR Part 63, Subpart GGG.</p>	The rule citations were determined from an analysis of the rule text and the basis of determination.
LOAD-1	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-0002	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.</p> <p>Daily Throughput = Loading less than 20,000 gallons per day.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
LOAD-1	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-001	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Loading and unloading.</p> <p>True Vapor Pressure = True vapor pressure less than 0.5 psia.</p>	
128	30 TAC Chapter 117, Subchapter B	R7ICI-0002	<p>Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent.</p> <p>Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).</p> <p>Unit Type = Process heater</p> <p>CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option</p> <p>Maximum Rated Capacity = Maximum rated capacity is at least 2 MMBtu/hr, but less than 40 MMBtu/hr.</p> <p>CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS.</p> <p>NOx Emission Limit Basis = Emission limit in lb/hr (or ppm by volume at 15% oxygen, dry basis) on a block one-hour average</p> <p>NOx Reduction = No NO<sub>x</sub> control method</p> <p>Fuel Type #1 = Natural gas</p> <p>NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]</p> <p>NOx Emission Limitation = Title 30 TAC §§ 117.310(d)(3) and 117.310(a)(8)</p>	
117	30 TAC Chapter 117, Subchapter B	R7ICI-0001	<p>NOx Emission Limitation = Title 30 TAC § 117.310(d)(3) [relating to mass emissions cap and trade in 30 TAC Chapter 101, Subchapter H, Division 3 and Emission Specifications for Attainment Demonstration].</p> <p>Unit Type = Other industrial, commercial, or institutional boiler.</p> <p>Maximum Rated Capacity = MRC is greater than or equal to 100 MMBtu/hr but less than 200 MMBtu/hr.</p> <p>NOx Monitoring System = Continuous emissions monitoring system.</p> <p>Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).</p> <p>CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option.</p> <p>CO Monitoring System = Monitored by method other than CEMS or PEMS.</p> <p>EGF System Cap Unit = The unit is not used as an electric generating facility to generate electricity for sale to the electric grid.</p> <p>Fuel Type #1 = Natural gas.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>NH3 Emission Limitation = Title 30 TAC § 117.310(c)(2).</p> <p>NOx Emission Limit Average = Emission limit in pounds/hour on a block one-hour average.</p> <p>NH3 Emission Monitoring = Oxidation of ammonia to nitric oxide (NO).</p> <p>NOx Reductions = Post combustion control technique with ammonia injection.</p> <p>Annual Heat Input = Annual heat input is greater than 2.2(10<sup>11</sup>) Btu/yr, based on rolling 12-month average.</p>	
117	40 CFR Part 60, Subpart D	60D-0001	Construction/Modification Date = On or before August 17, 1971.	
GRPCOOL	40 CFR Part 63, Subpart Q	63Q-0001	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.	
101	30 TAC Chapter 111, Visible Emissions	R1111-0001	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>SIP Violation = The source is able to comply with applicable PM and opacity regulations without the use of PM collection equipment and has not been found to be in violation of any visible emission standard in a State Implementation Plan.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>	
PAINT	30 TAC Chapter 115, Subchapter E, Division 5	R5451-0001	<p>Exemption = No exemption is being met.</p> <p>Alternative Control = No alternative control is being used.</p> <p>Low Usage = The total coating and solvent usage does not exceed 150 gallons in any consecutive 12-month period for all surface coating operations on the property.</p> <p>Alt Record = The facility is complying with the alternative recordkeeping requirements by maintaining records of total gallons of coating and solvent used each month and total gallons of coating and solvent used in the previous 12 months.</p>	
120	30 TAC Chapter 117, Subchapter B	R7ICI-0001	Maximum Rated Capacity = MRC is less than 40 MMBtu/hr	
170	30 TAC Chapter 117, Subchapter B	R7ICI-0001	Maximum Rated Capacity = MRC is less than 40 MMBtu/hr	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
TKINSPMSS2	30 TAC Chapter 117, Subchapter B	R7ICI-0001	Maximum Rated Capacity = MRC is less than 40 MMBtu/hr	
PRO-REGEN2	30 TAC Chapter 112, Sulfur Compounds	REG2-0002	<p>Facility Type = Sulfuric acid plant that burns alkylation acid, hydrogen sulfide, organic sulfides, mercaptans, or acid sludge by contact process.</p> <p>Effective Stack Height = The effective stack height is not less than the standard effective stack height.</p> <p>Production Capacity = Production capacity is greater than 300 tons per day (expressed as 100 percent acid).</p> <p>Facility Use = The plant is not used exclusively as a sulfur dioxide control system, chamber process plant, acid concentrator, or oleum transfer and storage facility.</p>	
PRO-REGEN2	40 CFR Part 60, Subpart H	60H-001	<p>Construction/Modification Date = After August 17, 1971.</p> <p>Process Design = The source does not process elemental sulfur or an ore that contains elemental sulfur, or processes elemental sulfur or an ore that contains elemental sulfur and does not use air to supply oxygen.</p>	
PRO-UNIT8	30 TAC Chapter 112, Sulfur Compounds	REG2-0001	<p>Facility Type = Sulfuric acid plant burning elemental sulfur by contact process.</p> <p>Effective Stack Height = The effective stack height is not less than the standard effective stack height.</p> <p>Production Capacity = Production capacity is greater than 300 tons per day (expressed as 100 percent acid).</p> <p>Facility Use = The plant is not used exclusively as a sulfur dioxide control system, chamber process plant, acid concentrator, or oleum transfer and storage facility.</p>	
PRO-UNIT8	40 CFR Part 60, Subpart H	60H-001	<p>Construction/Modification Date = After August 17, 1971.</p> <p>Process Design = The source does not process elemental sulfur or an ore that contains elemental sulfur, or processes elemental sulfur or an ore that contains elemental sulfur and does not use air to supply oxygen.</p>	
PRO-REGEN2	40 CFR Part 61, Subpart FF	61FF-0001	<p>AMOC = An alternate means of compliance (AMOC) to meet the requirements of 40 CFR § 61.348 for treatment processes is not used.</p> <p>Treatment Stream Unit Exempt = There are not units in the wastewater treatment system that are exempt according to 40 CFR § 61.348(b)(2).</p> <p>Complying with § 61.342(e) = The facility is not complying with 40 CFR § 61.342(e).</p> <p>Openings = The treatment process or wastewater treatment system unit has openings.</p> <p>Fuel Gas System = Not all gaseous vent streams from the treatment process or wastewater treatment system are routed to a fuel gas system.</p> <p>Stream Combination = The process wastewater, product tank drawdown, or landfill leachate is combined with other waste streams for the purpose of facilitating management or treatment in the wastewater treatment system.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Less Than Atmospheric = A cover and closed-vent system are operated such that the treatment process or wastewater system unit is maintained at ambient atmospheric pressure.</p> <p>Closed-Vent System and Control Device = A closed-vent system and control device is not used.</p> <p>Process Or Stream Exemption = The treatment process or waste stream is complying with 40 CFR §61.348(d).</p>	
PRO-REGEN2	40 CFR Part 63, Subpart G	63GTP-WW19	<p>Series of Processes = The wastewater stream is treated using a single treatment process.</p> <p>Biological Treatment Process = Non-biological treatment process.</p> <p>Wastewater Stream Designation = Group1 for Table 9 compounds.</p> <p>Wastewater Stream Treatment = Resource Conservation and Recovery Act (RCRA) unit option.</p>	
PRO-REGEN2	40 CFR Part 63, Subpart GGG	63GGG-1	Treatment Process = The wastewater or residual is discharged to a process heater or boiler burning hazardous waste and is subject to 40 CFR Part 63, Subpart GGG.	The rule citations were determined from an analysis of the rule text and the basis of determination.

\* - The "unit attributes" or operating conditions that determine what requirements apply

\*\* - Notes changes made to the automated results from the DSS, and a brief explanation why



## NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

## New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the “as applicable” language. The “as applicable” language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

[www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](http://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

### New Source Review Authorization References

<b>Prevention of Significant Deterioration (PSD) Permits</b>	
PSD Permit No.: PSDTX1081	Issuance Date: 06/20/2016
PSD Permit No.: PSDTX1260	Issuance Date: 07/26/2018
<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 149180	Issuance Date: 11/21/2017
Authorization No.: 19282	Issuance Date: 06/20/2016
Authorization No.: 4802	Issuance Date: 07/26/2018
Authorization No.: 56566	Issuance Date: 09/14/2016
Authorization No.: 92041	Issuance Date: 04/05/2010
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.183	Version No./Date: 06/18/1997
Number: 106.261	Version No./Date: 03/14/1997
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.371	Version No./Date: 03/14/1997
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.412	Version No./Date: 09/04/2000
Number: 106.433	Version No./Date: 09/04/2000
Number: 106.452	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 03/14/1997
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 7	Version No./Date: 09/12/1989
<b>Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum</b>	
Permit No.: HW50095	

### Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

### **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

### **Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected**

#### **Compliance Assurance Monitoring (CAM):**

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

<b>Unit/Group/Process Information</b>	
ID No.: PRO-REGEN2	
Control Device ID No.: PRO-REGEN2	Control Device Type: SO2 Scrubber
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart H	SOP Index No.: 60H-001
Pollutant: SO <sub>2</sub>	Main Standard: § 60.82(a)
<b>Monitoring Information</b>	
Indicator: Sulfur Dioxide Concentration	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: SO2 emission rates in excess of 4 pounds of SO2 per ton of 100% sulfuric acid produced shall be considered and reported as a deviation.	
Basis of CAM: It is widely practiced and accepted to calibrate and use a portable analyzer or CEMS to measure SO2 concentration with procedures such as EPA Test Method 6C. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard.	

<b>Unit/Group/Process Information</b>	
ID No.: PRO-UNIT8	
Control Device ID No.: PRO-UNIT8	Control Device Type: SO2 Scrubber
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart H	SOP Index No.: 60H-001
Pollutant: SO <sub>2</sub>	Main Standard: § 60.82(a)
<b>Monitoring Information</b>	
Indicator: Sulfur Dioxide Concentration	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: SO2 emission rates in excess of 4 pounds of SO2 per ton of 100% sulfuric acid produced shall be considered and reported as a deviation.	
Basis of CAM: It is widely practiced and accepted to calibrate and use a portable analyzer or CEMS to measure SO2 concentration with procedures such as EPA Test Method 6C. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard.	

**Periodic Monitoring:**

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: 101	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-0001
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per month	
Averaging Period: Six-minutes	
Deviation Limit: An opacity greater than 10% will be reported as a deviation.	
<b>Basis of monitoring:</b> The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: 48	
Control Device ID No.: CVS	Control Device Type: Vapor Collection System
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002B
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: VOC Concentration	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Fugitive emissions greater than 500 ppm above background shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.</p>	



Unit/Group/Process Information	
ID No.: 48	
Control Device ID No.: CVS	Control Device Type: Vapor Collection System
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002B
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Visual leaks in the closed vent system shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.</p>	

Unit/Group/Process Information	
ID No.: 48	
Control Device ID No.: 170	Control Device Type: Vapor Combustor
Control Device ID No.: PRO-REGEN2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: TKINSPMSS2	Control Device Type: Vapor Combustor
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002B
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Combustion temperature	
Minimum Frequency: Once per week	
Averaging Period: Six-minutes	
Deviation Limit: A combustion temperature below the minimum temperature of 1400 degrees Fahrenheit or as established in the NSR permit on a 6-minute averaging period shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors or thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

Unit/Group/Process Information	
ID No.: 49	
Control Device ID No.: CVS	Control Device Type: Vapor Collection System
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002B
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: VOC Concentration	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Fugitive emissions greater than 500 ppm above background shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: 49	
Control Device ID No.: CVS	Control Device Type: Vapor Collection System
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002B
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
<b>Monitoring Information</b>	
Indicator: Visual Inspection	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Visual leaks in the closed vent system shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.</p>	

Unit/Group/Process Information	
ID No.: 49	
Control Device ID No.: 170	Control Device Type: Vapor Combustor
Control Device ID No.: PRO-REGEN2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: TKINSPMSS2	Control Device Type: Vapor Combustor
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002B
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Combustion temperature	
Minimum Frequency: Once per week	
Averaging Period: Six-minutes	
Deviation Limit: A combustion temperature below the minimum temperature of 1400 degrees Fahrenheit or as established in the NSR permit on a 6-minute averaging period shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors or thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

Unit/Group/Process Information	
ID No.: 53	
Control Device ID No.: CVS	Control Device Type: Vapor Collection System
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: VOC Concentration	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Fugitive emissions greater than 500 ppm above background shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: 53	
Control Device ID No.: CVS	Control Device Type: Vapor Collection System
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
<b>Monitoring Information</b>	
Indicator: Visual Inspection	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Visual leaks in the closed vent system shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.</p>	

Unit/Group/Process Information	
ID No.: 53	
Control Device ID No.: 170	Control Device Type: Vapor Combustor
Control Device ID No.: PRO-REGEN2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: TKINSPMSS2	Control Device Type: Vapor Combustor
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Combustion temperature	
Minimum Frequency: Once per week	
Averaging Period: Six-minutes	
Deviation Limit: A combustion temperature below the minimum temperature of 1400 degrees Fahrenheit or as established in the NSR permit on a 6-minute averaging period shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors or thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	



<b>Unit/Group/Process Information</b>	
ID No.: B1	
Control Device ID No.: CVS	Control Device Type: Vapor Collection System
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
<b>Monitoring Information</b>	
Indicator: VOC Concentration	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Fugitive emissions greater than 500 ppm above background shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: B1	
Control Device ID No.: CVS	Control Device Type: Vapor Collection System
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
<b>Monitoring Information</b>	
Indicator: Visual Inspection	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Visual leaks in the closed vent system shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.</p>	

Unit/Group/Process Information	
ID No.: B1	
Control Device ID No.: 120	Control Device Type: Vapor Combustor
Control Device ID No.: PRO-REGEN2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Combustion temperature	
Minimum Frequency: Once per week	
Averaging Period: Six-minutes	
Deviation Limit: A combustion temperature below the minimum temperature of 1400 degrees Fahrenheit or as established in the NSR permit on a 6-minute averaging period shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors or thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: B2	
Control Device ID No.: CVS	Control Device Type: Vapor Collection System
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
<b>Monitoring Information</b>	
Indicator: VOC Concentration	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Fugitive emissions greater than 500 ppm above background shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: B2	
Control Device ID No.: CVS	Control Device Type: Vapor Collection System
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
<b>Monitoring Information</b>	
Indicator: Visual Inspection	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Visual leaks in the closed vent system shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.</p>	

Unit/Group/Process Information	
ID No.: B2	
Control Device ID No.: 120	Control Device Type: Vapor Combustor
Control Device ID No.: PRO-REGEN2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0002
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Combustion temperature	
Minimum Frequency: Once per week	
Averaging Period: Six-minutes	
Deviation Limit: A combustion temperature below the minimum temperature of 1400 degrees Fahrenheit or as established in the NSR permit on a 6-minute averaging period shall be considered and reported as a deviation.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors or thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

## Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (<https://www.tceq.texas.gov/goto/cfr-online>). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at [https://www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

[https://www.tceq.texas.gov/permitting/air/permitbyrule/air\\_pbr\\_index.html](https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html)

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/old106list/index106.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html)

Historical Standard Exemption lists may be viewed at the following website:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/oldselist/se\\_index.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

Additional information concerning PBRs is available on the TCEQ website:

[https://www.tceq.texas.gov/permitting/air/nav/air\\_pbr.html](https://www.tceq.texas.gov/permitting/air/nav/air_pbr.html)

## Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on 05/03/2019.

Site rating: 2.03 / Satisfactory Company rating: 1.40 / Satisfactory

(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating? .....No

## Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No

2. Is a compliance plan and schedule included in the permit? .....No

## Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes

OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes

OP-UA3 - Storage Tank/Vessel Attributes

OP-UA4 - Loading/Unloading Operations Attributes

OP-UA5 - Process Heater/Furnace Attributes

OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes

OP-UA7 - Flare Attributes

OP-UA8 - Coal Preparation Plant Attributes

OP-UA9 - Nonmetallic Mineral Process Plant Attributes

OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes

OP-UA11 - Stationary Turbine Attributes

OP-UA12 - Fugitive Emission Unit Attributes

OP-UA13 - Industrial Process Cooling Tower Attributes

OP-UA14 - Water Separator Attributes  
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes  
OP-UA16 - Solvent Degreasing Machine Attributes  
OP-UA17 - Distillation Unit Attributes  
OP-UA18 - Surface Coating Operations Attributes  
OP-UA19 - Wastewater Unit Attributes  
OP-UA20 - Asphalt Operations Attributes  
OP-UA21 - Grain Elevator Attributes  
OP-UA22 - Printing Attributes  
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes  
OP-UA25 - Synthetic Fiber Production Attributes  
OP-UA26 - Electroplating and Anodizing Unit Attributes  
OP-UA27 - Nitric Acid Manufacturing Attributes  
OP-UA28 - Polymer Manufacturing Attributes  
OP-UA29 - Glass Manufacturing Unit Attributes  
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes  
OP-UA31 - Lead Smelting Attributes  
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes  
OP-UA33 - Metallic Mineral Processing Plant Attributes  
OP-UA34 - Pharmaceutical Manufacturing  
OP-UA35 - Incinerator Attributes  
OP-UA36 - Steel Plant Unit Attributes  
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes  
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes  
OP-UA39 - Sterilization Source Attributes  
OP-UA40 - Ferroalloy Production Facility Attributes  
OP-UA41 - Dry Cleaning Facility Attributes  
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes  
OP-UA43 - Sulfuric Acid Production Attributes  
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes  
OP-UA45 - Surface Impoundment Attributes  
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes  
OP-UA47 - Ship Building and Ship Repair Unit Attributes  
OP-UA48 - Air Oxidation Unit Process Attributes  
OP-UA49 - Vacuum-Producing System Attributes  
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes  
OP-UA51 - Dryer/Kiln/Oven Attributes  
OP-UA52 - Closed Vent Systems and Control Devices  
OP-UA53 - Beryllium Processing Attributes  
OP-UA54 - Mercury Chlor-Alkali Cell Attributes  
OP-UA55 - Transfer System Attributes  
OP-UA56 - Vinyl Chloride Process Attributes  
OP-UA57 - Cleaning/Depainting Operation Attributes  
OP-UA58 - Treatment Process Attributes  
OP-UA59 - Coke By-Product Recovery Plant Attributes  
OP-UA60 - Chemical Manufacturing Process Unit Attributes  
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes  
OP-UA62 - Glycol Dehydration Unit Attributes  
OP-UA63 - Vegetable Oil Production Attributes